

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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RINA OH n/k/a RINA OH AMEN,

Plaintiff,

Case No.: 1:21 cv 08839

vs.

VIRGINIA L. GIUFFRE,

Defendant.
-----X

AFFIDAVIT OF SERVICE

STATE OF WESTERN AUSTRALIA

CITY OF PERTH, SUBURB OF OCEAN REEF ss.:

I, **Leah Kissane** [NAME OF PERSON WHO SERVED THE PAPERS], being duly sworn, depose and say: I am over 18 years of age and am not a party to this case. I reside at 27 Viridian Drive, Banksia Grove, Western Australia 6031.

On **March 5, 2022**, at approximately **2:15 P.M. (GMT+8)** I served the **Amended Summons and Amended Complaint** (attached are true and accurate copies of the foregoing papers I served), by personally handing and delivering them to **Robert Giuffre**, a person who identified himself to me to be Robert Giuffre and also to be the husband of the person to be served in this case, i.e., defendant **Virginia Giuffre**.

I delivered a true and accurate copy of the papers, the attached **Amended Summons and Amended Complaint** upon **Robert Giuffre** at the last known address of **Virginia Giuffre** at **12- Kylena Glade, Ocean Reef, Western Australia 6927**.

I served the papers in the manner indicated below [CHECK OFF THE APPROPRIATE BOX]:

- 1) ☐ INDIVIDUAL by delivering a true copy of each to the defendant personally; I knew the person served to be the person named in those papers. [FILL OUT DESCRIPTION BELOW.]
- 2) ☐ CORPORATION _____, a domestic corporation, by delivering a true copy of each to _____ [IDENTIFY PERSON SERVED], who is _____ [IDENTIFY THE INDIVIDUAL TO WHOM THE PAPERS WERE DELIVERED AND HIS/HER JOB TITLE]; I knew the corporation to be that listed in the papers served and I knew the title of the person named above and that he/she was authorized to accept service.
- 3) ☒ SUBSTITUTED SERVICE by delivering a true copy of each to **Robert Giuffre**, a person of suitable age and discretion, at the dwelling house, or usual place of abode of defendant **Virginia Giuffre** at the address located at **12- Kylena Glade, Ocean Reef, Western Australia 6927**, and mailing, as indicated below.

☐ SUBSTITUTED SERVICE by affixing a true copy to the door at _____

Which is the defendants _____.

I made prior attempts to serve at this location on the following dates and times: On March 4, 2022 at approximately 2.30pm I attended the address at **12- Kylena Glade, Ocean Reef, Western Australia 6927** to find the gate locked and no-one home. I rang the bell and called out however no-one answered. I left a card in the gate.

On March 4, 2022 at approximately 5.30pm I attended the address at **12- Kylena Glade, Ocean Reef, Western Australia 6927** to find the gate locked and my card had been taken. I rang the bell and called out but no-one answered.



MAILING: I also enclosed a copy of the above papers in a postpaid, sealed envelope, registered mail properly addressed to defendant Virginia Giuffre at defendant Virginia Giuffre's last known residence, located at **12- Kylene Glade, Ocean Reef, Western Australia 6927**, and I deposited the envelope in a post office depository under the exclusive care and custody of the Australian Postal Service within the Western State of Australia. **Attached is a copy of the registered mail receipt.**

DESCRIP- The individual, Robert Giuffre, that I served had the following characteristics:

TION X Male Female Hair color Dark Brown and Receding
Skin Color Olive

 21-34 yrs. X 35-50 yrs. 51-61 yrs. Over 61


 120-150 lbs. 151-181 lbs. X Over 182 lbs.

MILITARY SERVICE. I state upon information and belief that the defendant **Virginia Giuffre** is not in the military service of the United States or New York State since she resides in Australia and is not the age to serve in the military. The bases for my belief are my personal knowledge of defendant's residence and my conversations with representatives of counsel for plaintiff.

DATED: March 16, 2022

Signed in my presence

this 16 day of March, 2022.

Signature 
Name Printed:

Justice of the Peace

Sally Allen
Justice of the Peace
WA 9790


[SERVER'S NAME SIGNED]

Leah Danielle Kissano
[SERVER'S NAME PRINTED]

Addendum A - Registered mail receipt.

Please complete, tear off and lodge over the counter with your article. Enquiries: please call 13 POST (13 7676).

Optional services:
(Sender to ☒ selected services)

☐ Extra Cover (Over \$1.00 up to \$5,000)
Amount required: \$
Description of contents:

☒ Delivery Confirmation
☐ Person to Person
Additional fee is payable for each service.

Registered Post - Lodgement Receipt

Item addressed to:
Company name

For the attention of Virginia Givfre

PO Box number or street address

12 Rylena Glade

Suburb or town

Ocean Reef

State

WA 6027

I have read and agree to the information on the reverse side of this receipt.

Sender's name John Kissano

Sender's signature

[Signature]

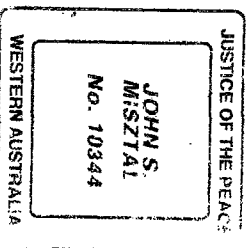
Date

WARNING: This envelope is not suitable for sending jewellery or precious stones. Small rigid items such as keys or coins should be securely packed to avoid loss or damage.

Sender to keep
RP044-00003 00-000 21817 12000

OFFICE POST MARK

John Kissano
JOHN KISSANO



[Signature]

[Signature]



Civil Action No. 1:21 cv 08839

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____ .

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____ , a person of suitable age and discretion who resides there,
 on *(date)* _____ , and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____ , who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____ ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Print

Save As...

Reset

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Attorneys for Plaintiff Rina Oh Amen

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
RINA OH n/k/a RINA OH AMEN,

Plaintiff,

vs.

VIRGINIA L. GIUFFRE,

Defendant.
-----X

**AMENDED
COMPLAINT**

Case No.: 21 cv 8839

Plaintiff Demands a
Trial by Jury

Plaintiff RINA OH n/k/a/ RINA OH AMEN (“Plaintiff”), by her attorneys, the Meyerowitz Law Firm, as and for her Amended Complaint against defendant VIRGINIA L. GIUFFRE (“Defendant”), alleges as follows:

THE PARTIES

1. Plaintiff Rina Oh n/k/a Rina Oh Amen is an individual who was and is a citizen of the State of New Jersey, United States.

2. Defendant Virginia L. Giuffre is an individual who was and is a citizen of the State of Colorado, United States.

JURISDICTION AND VENUE

3. This Court has subject matter, i.e., diversity jurisdiction, over this action pursuant to 28 USC § 1332(a)(2) as the amount in controversy exceeds the sum or value

of \$75,000, exclusive of interest and costs, and this controversy is between citizens of different states.

4. This Court has personal jurisdiction over Defendant, pursuant to New York's long arm statute NYCPLR 302(a), as Defendant has committed the tortious actions complained of herein in this State by making the defamatory statements related to Plaintiff herein that were published in this State on her twitter account and other platforms and publishing outlets. Defendant has also availed herself of the jurisdiction and use of this Court in commencing an action on August 09, 2021 in the matter entitled *Virginia Giuffre v. Prince Andrew*, 21 cv 06702, United States District Court, Southern District of New York.

5. Venue is proper pursuant to 28 USC §1391 for reasons similar to this Court having personal jurisdiction over Defendant on the grounds that, among other reasons, including, but not limited to, that: (i) a substantial part of the events and/or wrongful conduct that give rise to the claims alleged herein occurred in this District, i.e., amongst other reasons, the publishing and dissemination of Plaintiff's defamatory statements; (ii) Plaintiff suffered the effects and damages of Defendant's defamatory statements in this venue; and (iii) Defendant has availed herself of the use of this Court as set forth above.

FACTUAL ALLEGATIONS

6. Today, Plaintiff is married and a respected and well regarded artist.

7. However, twenty years ago, during some or all of the years 2000 and 2001, starting when Plaintiff was only around (21) twenty-one years' old, Plaintiff was solicited, manipulated, exploited, abused, and sex trafficked by the notorious Jeffrey Epstein ("Epstein"), and his co-conspirators, Ghislaine Maxwell ("Maxwell") and others.

8. Defendant knew or should have known that, at all relevant times, Plaintiff was a young victim of Epstein and not a co-conspirator of Epstein or a part of his inner circle of criminals (as concluded by the authorities, including the FBI).

9. Defendant knew or should have known that, just as Defendant claims purportedly happened to her, at all times, Plaintiff was being used, abused, exploited and manipulated by Epstein and his inner circle.

10. During that time in 2000 and 2001, Plaintiff was introduced by Epstein or Maxwell to Defendant and Plaintiff and Defendant spoke and saw each other on only a few occasions in Palm Beach, Florida and few occasions in New York.

11. On no occasion did Plaintiff sexually abuse or assault Defendant, or cut Defendant, and Defendant knows this to be true.

12. In the last 20 years, since Defendant and Plaintiff last saw each other in 2001, Defendant has never accused Plaintiff of any bad or criminal acts from that time.

13. However, recently Defendant began falsely and wrongly defaming and slandering Plaintiff on numerous occasions.

14. For instance, Defendant maintains a Twitter account under the handle and account name “Virginia Giuffre” at URL <https://twitter.com/VRSVirginia>.

15. On October 28th through October 31st, and December 31th of 2020, amongst other times, by and through her Twitter account, Defendant wrote certain Tweets, and then, by hitting send, Defendant published and broadcast those Tweets out to the world.

16. The foregoing Tweets, amongst others, with time stamps when Defendant published them, contained the following statements of fact that Defendant knew or should have known to be false.

- a. Virginia Giuffre @VRSVirginia “Ladies & Gentlemen meet Rina who now is pleading innocence since there’s a \$VCF\$ she has decided to come out as a victim, when on the record she was #Epstein’s GF”& was rewarded with \$\$ in trade for victims- real victims. May karma be upheld and justice be done.” @FBI @nytimes Butterfly
<https://twitter.com/MoonProfessor/status/1321613698637598720> 9:24 PM
Oct 28, 2020 Twitter for iPhone
<https://twitter.com/VRSVirginia/status/1321623957183684610>
- b. Virginia Giuffre @VRSVirginia Oct 28, 2020 “Rina- if you read this I hope you live in shame for the rest of your life. You don’t intimidate me any longer & the physical & mental scares you left me with should be enough to put your a** in jail, my line in the sand is drawn & your guilty! #LockHerUp” 7:03 PM Oct 28, 2020 Twitter for iPhone
<https://twitter.com/VRSVirginia/status/1321588495467491328>
- c. Virginia Giuffre @VRSVirginia Oct 28, 2020 “Jeffrey Epstein 'recruiter' admits bringing girls but denies abuse” Pathetic excuses from a deranged woman who was NO victim & should be sitting in jail next to #GhislaineMaxwell Rina-woman to woman, now that I am a woman, U disgust me. @DailyMail” 7:21 PM · Oct 28, 2020·Twitter for iPhone
<https://twitter.com/VRSVirginia/status/1321593015622758405>

- d. Virginia Giuffre @VRSVirginia “What really makes sense is that Rina, a co-conspirator for #Epstein & #GhislaineMaxwell would go on to marry a fellow co-conspirator involved with #MichaelJackson . 2 sick peas in a pod, you can’t even imagine how beyond sickened I feel right now. @pinkPeptobismol @teresajhelm” 7:59 PM · Oct 28, 2020·Twitter for iPhone <https://twitter.com/VRSVirginia/status/1321602627554045953>
- e. Virginia Giuffre @VRSVirginia “This picture that Rina painted with the sliced leg bleeding is exactly what she used to do to me, I have a 6 inch scar on my left leg from her cutting me. I can let a lot of s**t go, but this I will never forget. #PureEvil #LockHerUp” @FBI @thedailybeast @nytimes #Justice” Drop of bloodFolded handsButterfly 8:09 PM · Oct 28, 2020 Twitter for iPhone <https://twitter.com/VRSVirginia/status/1321605000628371456>
- f. Virginia Giuffre @VRSVirginia “Still being robbed of justice- just ask all the men & women I’ve named in my court docs why they still have their freedom to carry on with their untainted lives why I sit here crying my eyes out over rerun & rerun of the abusers still affecting my life.” @FBI @SDNYnews #unfair Butterfly 8:34 PM · Oct 28, 2020·Twitter for iPhone <https://twitter.com/VRSVirginia/status/1321611245712150533>

g. Virginia Giuffre @VRSVirginia “Design from 2000-2002 and classically trained in sculpture,” Uh Rina- those were the years in which you procured & partook in the abuse of minors with #Epstein Did he pay for that too? Your no survivor, your an oxygen thief. A virus on humanity.”
#Karma #Justice
<https://twitter.com/MoonProfessor/status/1321611635258134528> 9:13 PM
Oct 28, 2020 Twitter for iPhone
<https://twitter.com/VRSVirginia/status/1321621244144312320>

17. Then, Defendant continued to publicly defame and shame Plaintiff on December 31, 2020, by and through her Twitter account, where Defendant tweeted and/or re-tweeted the following falsehoods to the world:

a. Virginia Giuffre @VRSVirginia “The only issues I have Vincent is your sick, pathetic, psychopathic wife and the other Epstein women who take advantage of young victim. My credibility is full proof and the ppl that know me know that. Good luck with your smear campaign though”
December 31, 2020.

- b. Virginia Giuffre @VRSVirginia Retweet of a Tweet with a picture of an Asian baby holding money [Plaintiff is Asian] and stating that Plaintiff “only came forward after Epstein was already dead. I am “starting” to think they both [referring to Plaintiff and her husband] are here just for the benjamins.” December 31, 2020.



18. All of the foregoing statements are and were maliciously false, and Defendant knew them to be false when she published them.

19. Plaintiff did not do or say the things that Defendant accuses her in these Tweets. Plaintiff is and always was a victim and not a co-conspirator of Epstein and his gang. Plaintiff never cut, sexually assaulted or sexually abused Defendant. Plaintiff was and is guilty of no crime, and has never been charged with one.

20. Considering the high profile nature of the Jeffrey Epstein, Ghislaine Maxwell and Prince Andrew story, Defendant knew that accusing Plaintiff, a fellow victim, of such horrible things, that it would maximize the spread and harm and damage to Plaintiff, thereby making it more malicious and damaging.

21. Defendant has maliciously reiterated and republished these defamations and slanders in prior and subsequent tweets and interviews on podcasts, TV and for magazines, as well as in her memoirs entitled Billionaire's Playboy Club.

22. These defamations and slanders by Defendant are causing Plaintiff great harm.

23. Plaintiff commences this action against Defendant to stop Defendant from continuing to spew here false and defamatory bile and to hold Defendant accountable for the damages she knowingly has caused Plaintiff.

FIRST CAUSE OF ACTION

(DEFAMATION)

24. Plaintiff hereby repeats and realleges the allegations state above as if fully forth herein.

25. As set forth in detail above and herein, Defendant wrote and spoke certain statements of fact that she knew or should have known were false, and indeed were said by Defendant with knowledge and malicious disregard for the truth.

26. Said defamatory statements were created, written, spoken published and broadcast by Defendant, amongst other places, on her Twitter account and through a podcast, for third-parties and all the world to read, see and hear.

27. Said defamatory statements by Defendant were then picked up by major news organizations, like the NY Post, Vogue, and Daily Beast, as Defendant knew they would, and republished throughout the world news media, TV, and the world wide web.

28. Though these statements are false, and even when Plaintiff prevails herein, they will never die and will live in the internet forever, forever causing Plaintiff injury.

29. Defendant had no privilege, absolute, qualified or otherwise, to make said defamatory statements.

30. Defendant's defamatory statements directly and proximately caused Plaintiff to suffer compensatory damages related to both economic and non-economic damages, including, but not limited to, the following: loss of earnings and income, loss of business and contracts, loss of business and economic opportunities, damages to Plaintiff's name, reputation, and character, and business and standing in the community, as well as for pain and suffering, humiliation, shame, disgrace, mental anguish, loss of enjoyment of life, and anxiety and extreme emotion distress, amongst other things.

31. By this Amended Complaint, Plaintiff amended the initial Complaint herein to add the defamatory statements made by Defendant alleged and set forth in paragraph 17, above. For purposes of the statute of limitations, and pursuant to FRCP Rule 15(c), said statements relate back to the date of the other statements made by Plaintiff in her initial Complaint in that they involve the parties and arose out of the conduct set out in the initial Complaint herein.

32. Accordingly, for all of the foregoing reasons, Plaintiff is entitled to an award of compensatory damages in an amount to be determined at the trial, but in no event less than Ten Million (\$10,000,000) Dollars.

33. In light of the malicious, intentional and/or willful nature of Defendant's actions, Plaintiff is entitled to punitive damages, in an amount to be determined at trial, but believed to be in excess of Ten Million (\$10,000,000) Dollars.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury trial as provided by Rule 38(a) of the Federal Rules of Civil Procedure.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for relief on the counts stated above as against Defendant as follows:

- a. On the First Cause, that Plaintiff be awarded compensatory damages in an amount to be determined at trial and which is otherwise incalculable at this time, but is not less than Ten Million (\$10,000,000) Dollars;
- b. On the First Cause of Action, that Plaintiff be awarded punitive damages in an amount to be determined at trial, but in no event less than Ten Million (\$10,000,000) Dollars;
- c. That Plaintiff be awarded its attorneys' fees and costs under statutory and common law;
- d. That Plaintiff be awarded pre- and post-judgment interest cost and disbursements; and

e. That Plaintiff be awarded all other and further relief as the Court may deem just and proper.

Date: New York, New York
January 4, 2022

MEYEROWITZ LAW FIRM



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